

EXHIBIT 4



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December 20, 2024

Via Email and Hand Delivery

U.S. Attorney Jacqueline C. Romero
U.S. Attorney's Office
Eastern District of Pennsylvania
615 Chestnut Street
Suite 1250
Philadelphia, PA 19106

Re: Seizure of “www.waronfakes.com” Domain Name (Case No. 24-mj-1395)

Dear U.S. Attorney Romero:

This firm represents Timofey V, the registered owner and lawful operator of the domain name, “www.waronfakes.com” (“waronfakes.com”), and ANO Dialog. Waronfakes.com was seized by the government on September 4, 2024, as part of its seizure of 32 domains the government alleges were part of the Doppelganger campaign. Pursuant to 18 U.S.C. § 983(f)(1), on December 4, 2024, we sent via email and hand-delivered a letter demanding the return of the waronfakes.com domain name. We addressed our letter to FBI Special Agent in Charge Wayne Jacobs, copying you, because the name of the agent who signed the Affidavit is redacted and there is no assigned Assistant United States Attorney identified in the docket. A copy of our letter is attached. To date, we have not received a response either from your Office or the FBI.

The clear purpose of Section 983(f)(1) is to enable the parties to engage in a dialogue to try to resolve the matter informally without resort to court intervention. That was and remains our hope in sending this correspondence. The statute provides for 15 days for the government to respond to a request for the return of seized property before the property owner can seek relief from the court. Under that timetable, our client is permitted to file a petition for return of his domain name on or after December 20, and having received no response from either your Office or the FBI, it appears that our client is left with no choice but to proceed that way.

Although we still would welcome a conversation about the release of the domain name, we are hereby requesting the attached documents that we would expect the government would possess and present to the Court to support its seizure of the waronfakes.com domain name. As noted in

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our December 4 letter, there is minimal evidence presented in the Affidavit in Support of the Search Warrant related to our client and www.waronfakes.com, as opposed to the other 31 domain names seized on September 4. While we recognize the government is under no obligation to provide us with the requested documents at this time, we believe that having the chance to review them would enable us to better understand the basis for the seizure of the waronfakes.com domain which, as noted, seems like a clear outlier in the context of the Affidavit.

We would appreciate the courtesy of a response from your Office, or from the FBI by December 26, 2024, and in the absence of any response, will pursue our legal remedies before the Court.

Thank you,

/s/ Scott A. Coffina

SCOTT A. COFFINA

cc: Special Agent in Charge Wayne A. Jacobs
Joshua D. Hill, Esquire